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May 7, 2012

Ms. Jocelyn Boyd Chief Clerk and Administrator South Carolina Public Service Commission Synergy Business Park, The Saluda Building 101 Executive Center Drive Columbia, South Carolina 29210

Re:

Office of Regulatory Staff Petition to Review FCC Mandated Reductions to Intrastate Access Tariffs, Docket No. 2012-136-C

Dear Ms. Boyd:

Please find attached for filing a Petition to Intervene on behalf of United Telephone Company of the Carolinas d/b/a CenturyLink ("CenturyLink") in the above-referenced matter.

If you have any questions or need further information, please do not hesitate to contact me.

Sincerely,

Elliott & Elliott, P.A.

Scott Elliott

SE/jcl

Enclosures

cc: All Parties of Record w/enc.

#### BEFORE

#### THE PUBLIC SERVICE COMMISSION OF

#### SOUTH CAROLINA

DOCKET NO.: 2012-136-C

In re	)	
Office of Regulatory Staff Petition to	)	PETITION TO INTERVENE
Review FCC Mandated Reductions to	)	
Intrastate Access Tariffs	)	

Petitioner United Telephone Company of the Carolinas d/b/a CenturyLink

("CenturyLink" or "Petitioner"), by its undersigned attorneys, hereby petitions the South

Carolina Public Service Commission ("Commission") pursuant to Rule 103-825 of the

Commission's Rules, for an order allowing CenturyLink to intervene in the above-referenced

Docket, with full rights to participate as a party of record. In support of its Petition, CenturyLink shows the Commission the following:

- 1. CenturyLink is a facilities-based incumbent local exchange carrier in South Carolina.
- 2. CenturyLink seeks to intervene in this proceeding with full rights to participate as a party of record to represent its interests.
- 3. On March 29, 2012, the Office of Regulatory Staff ("ORS") filed a petition requesting that the Commission order all local exchange carriers affected by the FCC's USF/ICC Reform Order<sup>1</sup> to file appropriate tariff revisions on or before June 1, 2012 to provide the ORS, the Commission, and others the opportunity to review the proposed tariff filings prior to the July 1, 2012 deadline established by the FCC.

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<sup>&</sup>lt;sup>1</sup> See Connect America Fund, WC Docket No. 10-90, Report and Order and Further Notice of Proposed Rulemaking, FCC 11-161 (rel. Nov. 18, 2011) and Order on Reconsideration, FCC 11-189 (rel. Dec. 23, 2011). The ILEC Group also notes that the FCC's December 7, 2011 Order in this docket was amended by an Errata Order issued December 9, 2011 ("ICC/USF Reform Order").

- 4. On April 27, 2012, the South Carolina Cable Television Association ("SCCTA") filed a Petition to Intervene in this docket. SCCTA's filing also included a request for the Commission to examine the impact of the FCC's ICC/USF Reform Order on the South Carolina Interim LEC Fund.
- 5. On May 2, 2012, the Competitive Carriers of the South ("CompSouth") filed a Petition to Intervene in this docket. CompSouth concurrently filed in this docket a Petition to Implement the FCC's Inter-carrier Compensation and Universal Service Reform Order, requesting the Commission to consider re-examining and modifying the South Carolina Interim LEC Fund in light of the FCC's action.
- 6. On May 3, 2012, the South Carolina Telephone Coalition ("SCTC") filed a Petition to Intervene in this docket.
- CenturyLink assesses intrastate switched access charges on other carriers who use CenturyLink's network and will need to modify its tariffs to comply with the ICC/USF Reform Order. Thus, CenturyLink has a direct and substantial interest in the subject matter of the Petition filed by ORS commencing this proceeding.
- 8. CenturyLink also receives funds from the South Carolina ILF. To the extent the Commission decides it would be appropriate to consider the issues raised by SCCTA and CompSouth regarding ILF in the context of this docket, CenturyLink also has a direct and substantial interest in this matter.
- 9. While CenturyLink has not fully developed a position at this time, CenturyLink's position is that its participation in this proceeding is essential to protect its interests and will aid the Commission in a full and fair consideration and resolution of the issues raised in this proceeding.

10. Correspondence and communications to CenturyLink with respect to this proceeding should be directed to undersigned counsel.

WHEREAS CenturyLink respectfully requests that the Commission grant this Petition and permit its intervention to protect its interests, and grant all other relief that is just and proper.

Respectfully submitted,

Scott Elliott

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## BEFORE THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA

Docket No. 2012-136-C

In Re: Office of Regulatory Staff Petition to	)	
Review FCC Mandated Reductions to	)	CERTIFICATE OF SERVICE
Intrastate Access Tariffs	)	
	)	

I, Jackie C. Livingston, do hereby certify that I have this date served one (1) copy of the attached Petition to Intervene upon the following parties causing said copy to be deposited with the United States Postal Service, first class postage prepaid and properly affixed thereto, and addressed as follows:

John J. Pringle, Jr., Esquire Ellis, Lawhorne & Sims, P. A. Post Office Box 2285 Columbia, South Carolina 29202

Frank R. Ellerbe, III, Esquire Bonnie D. Shealy, Esquire Robinson McFadden & Moore, PC Post Office Box 944 Columbia, South Carolina 29202

Nanette S. Edwards, Esquire Office of Regulatory Staff 1401 Main Street, Suite 900 Columbia, South Carolina 29201

M. John Bowen, Jr., Esquire Margaret M. Fox, Esquire McNair Law Firm, P.A. Post Office Box 11390 Columbia, South Carolina 29211

Dated: May \_\_\_\_, 2012